

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889

DIRECT EMAIL shecker@kaplanhecker.com

November 26, 2022

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Neil Cole, No. 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. In connection with Mr. Cole's letter to the Court, dated November 26, 2022, and accompanying exhibit, and in light of jurors' legitimate privacy interest, *see Press-Enter. Co. v. Superior Ct. of California, Riverside Cnty.*, we respectfully request permission to file under seal the letter and Exhibit A to the letter. 464 U.S. 501, 512 (1984).

We are providing to Your Honor's Chambers and to the government copies of the letter and Exhibit A.

Respectfully submitted,



Sean Hecker